# vClass A MemberIN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

| Decitors.            | ) Re: D.I. 843            |
|----------------------|---------------------------|
| Debtors.             | ) (Jointly Administered)  |
| JOANN INC., et al. 1 | ) Case No. 25-10068 (CTG) |
| In re:               | ) Chapter 11              |

# NOTICE OF WITHDRAWAL OF T MESQUITE MKT WVS TX, LLC'S LIMITED OBJECTION TO THE PROPOSED CURE AMOUNT FOR DEBTORS TO ASSUME AND ASSIGN THE T MESQUITE MKT WVS TX, LLC COMMERCIAL LEASE TO BURLINGTON COAT FACTORY OF TEXAS, L.P.

T Mesquite MKT WVS TX, LLC ("<u>T Mesquite</u>"), by and through its undersigned counsel, hereby withdraws the *T Mesquite MKT WVS TX, LLC's Limited Objection to the Proposed Cure Amount for Debtors to Assume and Assign the T Mesquite MKT WVS TX, LLC Commercial Lease to Burlington Coat Factory of Texas, L.P. filed on May 12, 2025 at Docket No. 843.* 

Dated: June 2, 2025 Respectfully submitted,

#### **CLARK HILL PLC**

/s/ Karen M. Grivner

Karen M. Grivner (Bar No. 4372) 824 N. Market Street, Suite 710

Wilmington, DE 19801 Telephone: (302) 250-4750 Facsimile: (302) 421-9439

Facsimile: (302) 421-9439 kgrivner@clarkhill.com

-and-

HB: 4900-3243-3180.3

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

Case 25-10068-CTG Doc 1061 Filed 06/02/25 Page 2 of 4

Michael A. Brandess HUSCH BLACKWELL LLP 120 S. Riverside Plaza, Suite 2200 Chicago, IL 60606 Telephone: (312) 526-1542 Facsimile: (312) 655-1501

michael.brandess@huschblackwell.com

Attorneys for T Mesquite MKT WVS TX, LLC

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 2, 2025, I caused a true and correct copy of this *Notice of Withdrawal* to be electronically filed and served via CM/ECF to all parties requesting electronic service in this case and upon the notice parties listed on the attached service list as set forth in the Procedures Order.

/s/ Karen M. Grivner

#### **SERVICE LIST**

#### **Debtors**

Jo-Ann Stores, LLC Attn.: Ann Aber, EVP, Chief Legal and **Human Resources Officer** 5555 Darrow Road Hudson, Ohio 44236

#### **Co-Counsel to Debtors**

Kirkland & Ellis LLP Attn.: Aparna Yenamandra 601 Lexington Ave. New York, New York 10022 aparna.yenamandra@kirkland.com

Kirland & Ellis LLP Attn.: Jeffrey Michalik, Lindsey Blumenthal 333 West Wolf Point Plaza Chicago, Illinois 60654 jeff.mickalik@kirkland.com

# **United States Trustee** United States Trustee Attn.: Malcom M. Bates

844 King St., Suite 2207, Lockbox 35 Wilmington, Delaware 19801 malcolm.m.bates@usdoj.gov

#### **Co-Counsel to Debtors**

Cole Schotz P.C.,

Attn.: Patrick J. Reilley, Stacy L. Newman, Michael E. Fitzpatrick, Jack M. Dougherty 500 Delaware Ave., Suite 1410 Wilmington, Delaware 19801 preilley@coleschotz.com snewman@coleschotz.com mfitzpatrick@coleschotz.com idougherty@coleschotz.com

# **Counsel to Prepetition ABL Agent**

lindsey.blumenthal@kirkland.com

Morgan, Lewis & Bockius LLP Attn.: Christopher L. Carter, Marjorie Crider One Federal Street Boston, Massachusetts 02110 christopher.carter@morganlewis.com marjorie.crider@morganlewis.com -and-Reed Smith LLP,

Attn.: Kurt F. Gwynne, Jason D. Angelo 1201 North Market St., Suite 1500 Wilmington, Delaware 19801 kgwynne@reedsmith.com jangelo@reedsmith.com

# **Counsel to Prepetition Term Loan Agent**

ArentFox Schiff LLP Attn.: Jeffrey Gleit 1301 Ave. of the Americas, 42<sup>nd</sup> Floor New York, New York 10019 jeffrey.gleit@afslaw.com

ArentFox Schiff LLP Attn.: Jonathan Bagg 1717 K Street NW Washington, D.C. 20006 jonathanbagg@afslaw.com

ArentFox Schiff LLP Attn.: Matthew Bentley 233 South Wacker Drive, Suite 7100 Chicago, Illinois 60606 matthew.bentley@afslaw.com

## **Counsel to Prepetition FILO Agent**

Choate Hall & Stewart LLP Attn.: John Ventola, Jonathan Marshall

2 International Place

Boston, Massachusetts 02110

jventola@choate.com imarshall@choate.com

-and-

DLA Piper LLP (US)

Attn.: Stuart Brown, Esq.

1201 N. Market St., Suite 2100 Wilmington, Delaware 19801

stuart.brown@dlapiper.com

# **Counsel to Gordon Brothers** Retail Partners, LLC

Katten Muchin Rosenman LLP Attn.: Steven Reisman, Cindi Giglio 50 Rockefeller Plaza New York, New York 10020 sreisman@katten.com cgiglio@katten.com

# **Counsel to the Prepetition Term Loan Lender Ad Hoc Group**

Gibson, Dunn & Crutcher LLP

Attn.: Scott Greenberg, Kevin Liang, Josh

**Brody** 

200 Park Ave.

New York, New York 10166

sgreenberg@gibsondunn.com

kliang@gibsondunn.com

jbrody@gibsondunn.com

# **Counsel to Official Committee of Unsecured Creditors**

Kelley Drye & Warren LLP

Attn.: Jason Adams, Maeghan McLoughlin,

Connie Choe

3 World Trade Center

New York, New York 10007

jadams@kelleydrye.com

mmcloughlin@kelleydrye.com

cchoe@kelleydrye.com

-and-

Pachulski Stang Ziehl & Jones LLP

Attn.: Bradford Sandler, James O'Neill

919 North Market Street, 17<sup>th</sup> Floor

P.O. Box 8705

Wilmington, Delaware 19899-8705

bsandler@pszjlaw.com

joneill@pszjlaw.com